

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

EMILIO MERCADO CHACON

DEBTOR

CASE NO 14-04868-MCF

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S OBJECTION TO DEBTOR'S MOTION
REQUESTING RECONSIDERATION OF DISMISSAL ORDER, DOCKET #78**

TO THE HONORABLE COURT:

NOW COMES, EMILIO MERCADO CHACON, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On March 29, 2016, the Chapter 13 Trustee filed an objection to debtor's motion requesting reconsideration of dismissal Order, docket #78, basically stating that the "...Debtor is 3 months, or \$780.00, in arrears with plan payments", and that "[t]he case should remain dismissed until Debtor becomes current under the terms of the plan". *Trustee's Objection to Debtor's Motion Requesting Reconsideration of Dismissal Order*, paragraph 4, page 1, docket #78.

2. The debtor hereby respectfully submits that on April 15, 2016, he made a \$780.00 payment in order to cure any and all arrears owed to the Trustee. Attached is copy of evidence of said payment.

3. With this information debtor responds to the *Trustee's Objection to Debtor's Motion Requesting Reconsideration of Dismissal Order*, docket #78.

WHEREFORE, the debtor respectfully requests this Honorable Court grant this motion, deny *Trustee's Objection to Debtor's Motion Requesting Reconsideration of Dismissal Order*, docket #78, and grant debtor's motion and set aside/reconsider the March 8, 2016, *Order Dismissing Case* (docket #74) entered in the above captioned case.

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Debtor's Reply to Trustee's Objection to Reconsideration
Case no. 14-04868-MCF13

I **HEREBY CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the debtor to his address of record.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of April, 2016.

/s/ **Roberto Figueroa Carrasquillo**
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UNITED STATES POSTAL SERVICE®		POSTAL MONEY ORDER	
Serial Number	23536787174	Year Month Day 2016-04-15	Post Office 007350
		U.S. Dollars and Cents	
		\$780.00	
Amount		Seven Hundred Eighty Dollars and 00/100 *****	
Pay to	Jose R. Carrion	Clerk	0
Address	P.O. Box 88109 Chicago IL 60680-1109	From	Emilio Mercado
Memo	# 1404868	Address	Treasure Valley C/Mexico A-12
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